

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Part 2 of the Commission's Rules to)	ET Docket No. 00-258
Allocate Spectrum Below 3 GHz for Mobile and)	
Fixed Services to Support the Introduction of New)	
Advanced Wireless Services, including Third)	
Generation Wireless Systems)	
)	
Amendment of Section 2.106 of the Commission's)	ET Docket No. 95-18
Rules to Allocate Spectrum at 2 GHz for Use by)	
By the Mobile-Satellite Service)	
)	
The Establishment of Policies and Service Rules for the)	IB Docket No. 99-81
Mobile-Satellite Service in the 2 GHz Band)	
)	
Petition for Rule Making of the Wireless)	RM-9498
Information Networks Forum Concerning the)	
Unlicensed Personal Communications Service)	
)	
Petition for Rulemaking of UTStarcom, Inc.,)	RM-10024
Concerning the Unlicensed Personal)	
Communications Service)	

REPLY COMMENTS OF THE CDMA DEVELOPMENT GROUP, INC. (CDG)

The CDMA Development Group ("CDG")¹ hereby respectfully submits these
reply comments in response to the Commission's Further Notice of Proposed Rule

¹ The CDG is a non-profit international trade association of 110 companies, including the world's leading manufacturers and operators of digital cellular, personal communications services (PCS), and third generation systems based on Code Division Multiple Access (CDMA) technology. The CDG's mission is to lead the rapid evolution and deployment of CDMA-based systems, based on open standards and

Making (“FNPRM”) in the above-captioned proceeding.² The CDG supports the Commission's continued efforts to identify and allocate spectrum for mobile and fixed services to support the introduction of new advanced wireless services, including third generation wireless systems. As mentioned in its initial comments in response to the Commission’s NPRM in this proceeding (ET Docket No. 00-258), the CDG has encouraged the Commission to address this issue because of domestic and international pressures for the United States to indicate what additional spectrum it will be identifying for deployment of IMT-2000 systems.

The CDG commends the Commission’s efforts to consider new allocation options to support the future growth of advanced wireless services. The CDG believes that the next several years will bring exciting new developments in the deployment of advanced wireless services. Today, there are more than 100 million CDMA subscribers, including over 1.5 million users of CDMA2000, an ITU-approved IMT-2000 standard that was introduced over a year ago in the Korean market. In the next six months, at least sixteen additional operators worldwide will be implementing CDMA2000 services in currently licensed bands and the CDG expects strong growth in the number of CDMA2000 subscribers as users take advantage of the provision of wireless data service at initial data rates of up to 144 Kbps. There are currently over 23 CDMA2000 terminal products

encompassing all core architectures, to meet the needs of markets around the world in an emerging, information-intensive environment.

² *Amendment of Part 2 of the Commission’s Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, including Third Generation Systems*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, FCC 01-224 (released August 20, 2001).

available on the market, and this number is expected to increase to 43 handset models available by the end of 2001.

Upon review of the new spectrum options proposed by the Commission in its FNPRM, the CDG supports the reallocation of the 2150-2160 MHz and the 2165-2170 MHz bands as additional spectrum for advanced wireless services. The addition of these partial bands for advanced wireless services will greatly assist the implementation of the 1710-1770 MHz with 2110-2170 MHz band pairing that is being examined pursuant to the National Telecommunications and Information Administration's recent press release.³ The 1710-1770 MHz with 2110-2170 MHz band pairing is the most viable option for identifying and allocating additional spectrum for new advanced wireless services in the United States given the constraints faced by the Commission and other Federal Government agencies in considering other bands, as noted by other commenting parties.⁴ Furthermore, this pairing is the best current alternative, particularly in light of the importance for the U.S. Government to convey its spectrum policy plans as soon as possible to other nations as they are also considering their own alternatives for advanced wireless services. The pairing option of 1710-1770 MHz with 2110-2170 MHz will facilitate global harmonization of advanced wireless services as this pairing arrangement corresponds with allocations for mobile systems in other parts of the world. Additionally, the Commission's selection of this pairing option will provide

³ NTIA, *NTIA Statement Regarding New Plan to Identify Spectrum for Advanced Wireless Mobile Services (3G)*, available at http://www.ntia.doc.gov/ntiahome/threeg/3gplan_100501.htm

⁴ *Motorola Comments* at 5, 6; *CTIA Comments* at 9-12; *Verizon Wireless Comments* at 4-5.

manufacturers and operators with market certainty, which will, in turn, permit these companies to develop products and strategies to better serve the global marketplace.

While spectrally efficient CDMA technologies will maximize the ability of operators to provide advanced services within any given spectrum, the CDG anticipates an increasing growth in the demand for and opportunities in the provisioning of wireless services. The CDG, therefore, urges the Commission and other Federal Government agencies to work towards the identification and allocation of the 1710-1770 MHz/2110-2170 MHz bands in the near future.

Respectfully submitted,

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